



# **COMMONWEALTH of VIRGINIA**

## **DEPARTMENT OF ENVIRONMENTAL QUALITY**

### **SOUTHWEST REGIONAL OFFICE**

Matthew J. Strickler  
Secretary of  
Natural Resources

355-A Deadmore Street, Abingdon, Virginia 24210  
(276) 676-4800 Fax: (276) 676-4899  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

David K. Paylor  
Director

Jeffrey L. Hurst  
Regional Director

July 3, 2019

Mr. James Aldred  
General Manager  
Guardian Fabrication LLC  
110 Jack Guynn Drive  
Galax, Virginia 24333

Location: Galax, Virginia  
Registration No. 11085  
Facility ID No. 51-640-00067

Dear Mr. Aldred:

Attached is an administrative amendment to your Title V permit to operate your mirror manufacturing facility pursuant to 9VAC5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. This administrative amendment reflects the name change for this facility. This permit replaces your permit dated July 18, 2018. The permit expiration date remains unchanged.

The permit amendment contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In evaluating the application and arriving at a final decision to issue this permit, amendment, the Department deemed the application complete on May 23, 2019. Public notice and public participation are not required per 9VAC5-80-200.

This amendment approval does not relieve Guardian Fabrication LLC of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit amendment is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Mr. James Aldred  
July 3, 2019  
Page 2

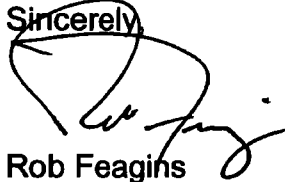
Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit amendment or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
P.O. Box 1105  
Richmond, Virginia 23218

In the event that you receive this permit amendment by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call me at (276) 676-4835.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Feagins', is written over the word 'Sincerely,'.

Rob Feagins  
Air Permit Manager

Attachment: Amended permit

cc: Director, OAPP (electronic file submission)  
Manager, Data Analysis (electronic file submission)  
Chief, Air Enforcement Branch (3AT13), U.S. EPA, Region III



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## Federal Operating Permit Article 1

Until such time as this permit is reopened and revised, modified, revoked, terminated or it expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-305 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	<b>GUARDIAN FABRICATION LLC</b>
Facility Name:	<b>PLANT NO. 2</b>
Facility Address:	<b>110 JACK GUYNN DRIVE, GALAX VA</b>
DEQ Registration No:	<b>11085</b>
Permit Number:	<b>SWRO11085</b>
Effective Date:	<b>MARCH 16, 2017</b>
Amendment Date:	<b>JULY 3, 2019</b>
Expiration Date:	<b>MARCH 15, 2022</b>

Jeffrey Hurst  
Regional Director

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## **Facility Information**

### **Permittee**

Guardian Fabrication LLC  
110 Jack Guynn Drive  
Galax, VA 24333

### **Responsible Official**

Mr. James Aldred  
General Manager  
(276) 236-5196

### **Contact Person**

Mike Sizemore

### **Facility**

Plant No. 2  
110 Jack Guynn Drive, Galax, VA

**County-Plant Identification Number: 51-640-00067**

### **Facility Description: NAICS No. 327215 – Glass Product Manufacturing Made of Purchased Glass (SIC 3231)**

Guardian Fabrication LLC manufactures glass mirrors at their Plant #2, in Galax, Virginia. Sheets of glass are delivered to the plant and fed onto the silver line where they are transformed into mirrors on a constantly moving conveyor line. The top surface of the glass is cleaned with water and automated rotating brushes and is then lightly etched with cerium oxide. The cerium oxide roughens the surface of the glass and improves chemical adhesion. A tin sensitizer solution chemically bonds the silver solution (which produces the reflective mirror surface) to the glass. A copper solution is applied over the silver solution to improve the adhesion of the mirror backing paint to the reflective mirror surface. The mirrors are then heated in an electric oven. The heated mirrors pass through a continuously flowing curtain of paint at the curtain coater. The backing paint is applied over the reflective metals to protect them from environmental conditions (moisture). The viscosity of the backing paint is constantly monitored and additional solvent is added as needed. The mirror back painting process is responsible for the majority of the VOC emissions from the facility.

After exiting the curtain coater, the mirrors are dried in a series of infrared ovens that encompass a section of the conveyor line. The mirrors are allowed to cool slightly before entering the rotogravure, which applies an ultra-violet (UV) coating over the backing paint to protect and improve its durability. UV light is used to cure the UV coating. Ink lettering may be applied to the back of the mirror, depending on the customer's requirements.

The mirrors are then unloaded from the conveyor line and inspected for flaws. The mirrors may then be sent directly to shipping or to any of the various cutting, grinding, sealing, and/or beveling operations at the facility.

Emission sources at the facility include the curtain coater (mirror backing paint), glass cutting lubricant, glass grinding & beveling coolant, and the polyurethane sealant application process.

The facility contains one 1,060,000 Btu/hr propane-fired boiler, forty-two propane-fired space heaters with a combined rated capacity of 5,353,000 Btu/hr, four Weben Jarco propane-fired water heaters with a combined rated capacity of 2,520,000 Btu/hr, and one propane-fired water heater rated at 440,000 Btu/hr located in the truck wash building.

The facility is a Title V major source of VOC, xylene, ethyl benzene, and total hazardous air pollutant (HAP) emissions. This source is located in an attainment area for all criteria pollutants. The facility is currently permitted under a minor NSR Permit issued on May 22, 2012.

Compliance Assurance Monitoring (CAM) requirements (40 CFR 64) are not applicable to this facility since there are no pollution control devices associated with the emission units.

## Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment (all propane-fired)</b>							
3.A	3.A	Ace Buchler model B11E boiler	1.06 mmBtu/hr	-	-	-	NSR permit issued May 22, 2012
3.B	n/a	1 - Cox Radiant 100-6 space heater	0.15 mmBtu/hr	-	-	-	
3.C	n/a	1 - Carrier 48 HD008-6 space heater	0.203 m4mBtu/hr	-	-	-	
3.D	n/a	40 - Cox Radiant 125 - 6 space heaters	0.125 mmBtu/hr each	-	-	-	
3.E	3.05	Weben-Jarco AJH-CN35 water heater (1989)	0.35 mmBtu/hr	-	-	-	
3.F	3.06	Weben-Jarco AJH-CN50 water heater (1989)	0.5 mmBtu/hr	-	-	-	
3.G	3.07	Weben-Jarco AJH-CN70 water heater (1989)	0.7 mmBtu/hr	-	-	-	
3.H	3.08	Weben-Jarco AJH-CN97 water heater (1989)	0.97 mmBtu/hr	-	-	-	
3.I	3.09	Farleys GEM-4SLP water heater	0.44 mmBtu/hr	-	-	-	
3J	-	Generac Emergency Generator – manufactured in 2007	40 hp	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Curtain Coater – Mirror Back Painting</b>							
1.A	2,3,4	Sommer and Maca mirror backing paint curtain coater	40 gpm	-	-	-	NSR permit issued May 22, 2012
<b>Rotogravure UV Process</b>							
1.B	1.C	Sommer and Maca rotogravure UV roll coater	7 lbs/hr	-	-	-	NSR permit issued May 22, 2012
<b>Glass Cutting</b>							
2	-	Lubricant for Bystronic Glass Cutting Machine	2 lbs/hr	-	-	-	NSR permit issued May 22, 2012
<b>Glass Grinding &amp; Beveling</b>							
4	-	Coolant for glass grinding & beveling operations	200 gal/wk	-	-	-	NSR permit issued May 22, 2012
<b>Polyurethane sealing system</b>							
5	-	Polyurethane sealant application system	50 lbs/hr	-	-	-	NSR permit issued May 22,



Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
							2012

**Fuel Burning Equipment Requirements - (emission unit ID# 3)**

1. **Fuel Burning Equipment Requirements - (emission unit ID#s 3A, 3B, 3C, 3D, 3E, 3F, 3G, 3H, and 3I) - Limitations** - The approved fuel for the space heaters, water heaters, and the boiler is propane. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-1180, 9 VAC 5-80-110 B, and Condition 2 of the NSR permit issued May 22, 2012)
2. **Fuel Burning Equipment Requirements - (emission unit ID#s 3A, 3B, 3C, 3D, 3E, 3F, 3G, 3H, and 3I) - Limitations** - The combined emissions from the operation of the forty-two (42) propane-fired space heaters, the five (5) propane-fired water heaters, and propane-fired boiler shall not exceed the limits specified below:

Total Suspended Particulate/PM10	0.14 lbs/hr	0.60 tons/yr
Sulfur Dioxide (SO2)	0.18 lbs/hr	0.80 tons/yr
Nitrogen Oxides (as NO2)	1.08 lbs/hr	4.73 tons/yr
Carbon Monoxide	0.27 lbs/hr	1.20 tons/yr
Volatile Organic Compounds	0.05 lbs/hr	0.24 tons/yr

(9 VAC 5-50-260, 9 VAC 5-80-110 B, and Condition 16 of the NSR permit issued May 22, 2012)
3. **Fuel Burning Equipment Requirements - (emission unit ID# 3J) - Limitations** – The approved fuel for the Generac emergency generator is propane. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-110 B)
4. **Fuel Burning Equipment Requirements - (emission unit ID# 3J) – Limitations** - The Generac emergency generator (ID# 3J) shall meet the requirements of 40 CFR63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, by meeting the requirements of 40CFR60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Per 40CFR60.4230(a)(4)(iv), no requirements of Subpart JJJJ apply to this engine.  
(9 VAC 5-80-110, 40CFR63.6590(a)(2)(ii), 40CFR63.6590(c)(6), and 40CFR60.4230(a)(4)(iv))
5. **Fuel Burning Equipment Requirements - (emission unit ID#s 3A, 3B, 3C, 3D, 3E, 3F, 3G, 3H, and 3I) – Monitoring and Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall include, but are not limited to, the combined annual consumption of propane in the forty-two (42) propane-fired space heaters, five (5) propane-fired water heaters, and the propane-fired boiler (as listed in Condition 1 of the NSR permit issued May 22, 2012), calculated as the sum of each consecutive twelve (12) month period. Hourly throughput (or emissions) shall be calculated by

dividing the total monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the propane-fired space heaters, water heaters, and boiler shall be accomplished through the recordkeeping requirements listed above.

(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

6. **Fuel Burning Equipment Requirements - (emission unit ID# 3) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**Process Equipment Requirements - (emission unit ID# 1A)**

7. **Process Equipment Requirements - (emission unit ID# 1A) – Limitations** – The curtain coater mirror back painting operation shall consume no more than 24.0 lbs/hr and 48.3 tons/yr of reducer, calculated as the sum of each consecutive 12 - month period.  
(9 VAC 5-80-1180, 9 VAC 5-80-110 B, and Condition 4 of the NSR permit issued May 22, 2012)
8. **Process Equipment Requirements - (emission unit ID# 1A) – Limitations** – The curtain coater mirror back painting operation shall consume no more than 100 lbs/hr and 850 lbs/yr of Red Spot Paint & Varnish Co., Inc.'s Guardian Galax CC coating, or equivalent, calculated as the sum of each consecutive 12-month period. The volatile organic compound (VOC) content of the paint shall not exceed 52.63% by weight.  
(9 VAC 5-80-1180, 9 VAC 5-80-110 B, and Condition 5 of the NSR permit issued May 22, 2012)
9. **Process Equipment Requirements - (emission unit ID# 1A) – Limitations** – The curtain coater mirror back painting operation shall consume no more than 177.9 lbs/hr and 391.0 tons/yr of paint, calculated as the sum of each consecutive 12 - month period. Only paints identified as **UC 57354, UC 57460, Betashield 5000 (07280207 and 07280177), Valspar 900X100, Sureguard D900X170 Gray Low Lead Rollcoat, Valspar 10L093, or their equivalents**, may be utilized in the curtain coating mirror back painting operation. The volatile organic compound (VOC) content of the paint shall not exceed 44.57% by weight.  
(9 VAC 5-80-1180, 9 VAC 5-80-110 B, and Condition 6 of the NSR permit issued May 22, 2012)

10. **Process Equipment Requirements - (emission unit ID# 1A) – Limitations –**  
Emissions from the operation of the curtain coater mirror back painting operation shall not exceed the limitations specified below:

Volatile Organic Compounds      103.29 lbs/hr      222.57 tons/yr

Annual emissions are to be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, and Condition 12 of the NSR permit issued May 22, 2012)

11. **Process Equipment Requirements - (emission unit ID# 1A) – Monitoring and Recordkeeping** – The permittee shall maintain a monthly and annual material balance for the curtain coater mirror back painting operation, including the throughput and emissions of VOC. Hourly throughput (or emissions) shall be calculated by dividing the total monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the curtain coater mirror back painting operation shall be accomplished through the recordkeeping requirements listed above.

(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

12. **Process Equipment Requirements - (emission unit ID# 1A) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**Process Equipment Requirements - (emission unit ID# 1B)**

13. **Process Equipment Requirements - (emission unit ID# 1B) – Limitations –**  
The rotogravure UV coating process shall consume no more than 25 lbs/hr and 73 tons/yr of the Fenzi S.P.A. Topcoat UV 1 coating or its equivalent, calculated as the sum of each consecutive 12-month period.  
(9 VAC 5-80-1180, 5-80-110 B, and Condition 7 of the NSR permit issued May 22, 2012)

14. **Process Equipment Requirements - (emission unit ID# 1B) – Limitations –**  
Emissions from the operation of the rotogravure UV coating process shall not exceed the limitations specified below:

Volatile Organic Compounds      2.75 lbs/hr      8.03 tons/yr

Annual emissions are to be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, and Condition 13 of the NSR permit issued May 22, 2012)

15. **Process Equipment Requirements - (emission unit ID# 1B) – Monitoring and Recordkeeping** – The permittee shall maintain a monthly and annual material balance for the rotogravure UV coating process including the throughput and emissions of VOC. Hourly throughput (or emissions) shall be calculated by dividing the total monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the rotogravure UV coating process shall be accomplished through the recordkeeping requirements listed above.  
(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

16. **Process Equipment Requirements - (emission unit ID# 1B) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**Process Equipment Requirements - (emission unit ID# 2)**

17. **Process Equipment Requirements - (emission unit ID# 2) – Limitations** – The glass cutting operations shall consume no more than 65.0 lbs/hr and 10.0 tons/yr of mineral spirits or equivalent lubricant, calculated as the sum of each consecutive 12-month period.  
(9 VAC 5-80-10, 5-80-110 B, and Condition 8 of the NSR permit issued May 22, 2012)

18. **Process Equipment Requirements - (emission unit ID# 2) – Limitations** – Emissions from the glass cutting operations shall not exceed the limitations specified below:

Volatile Organic Compounds      65.00 lbs/hr   10.00 tons/yr

Annual emissions are to be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, and Condition 14 of the NSR permit issued May 22, 2012)

19. **Process Equipment Requirements - (emission unit ID# 2) – Monitoring and Recordkeeping** – The permittee shall maintain a monthly and annual material balance for the glass cutting operations including the throughput and emissions of VOC. Hourly throughput (or emissions) shall be calculated by dividing the total

monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the glass cutting operations shall be accomplished through the recordkeeping requirements listed above.  
(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

20. **Process Equipment Requirements - (emission unit ID# 2) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**Process Equipment Requirements - (emission unit ID# 4)**

21. **Process Equipment Requirements - (emission unit ID# 4) – Limitations** –The glass grinding & beveling operations shall consume no more than 13.9 lbs/hr and 50.0 tons/yr of Quaker Microcut 106-C, or equivalent coolant, calculated as the sum of each consecutive 12-month period.  
(9 VAC 5-80-1180, 5-80-110 B, and Condition 9 of the NSR permit issued May 22, 2012)

22. **Process Equipment Requirements - (emission unit ID# 4) – Limitations** – Emissions from the circulation and storage of the glass coolant shall not exceed the limitations specified below:

Volatile Organic Compounds	1.39 lbs/hr	5.00 tons/yr
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Annual emissions are to be calculated as the sum of each consecutive twelve 12-month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, and Conditions 15 of the NSR permit issued May 22, 2012)

23. **Process Equipment Requirements - (emission unit ID# 4) – Monitoring and Recordkeeping** –The permittee shall maintain a monthly and annual material balance for the glass coolant used in the glass grinding & beveling operations, including the throughput and emissions of VOC. Hourly throughput (or emissions) shall be calculated by dividing the total monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the glass grinding & beveling

operations shall be accomplished through the recordkeeping requirements listed above.

(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

24. **Process Equipment Requirements - (emission unit ID# 4) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**Process Equipment Requirements - (emission unit ID# 5)**

25. **Process Equipment Requirements - (emission unit ID# 5) – Limitations** –The polyurethane sealant application process (Unit ID No. 5) shall consume no more than 50.0 lbs/hr and 13.0 tons/yr of 3M™ Polyurethane Sealant 540, or equivalent, calculated as the sum of each consecutive 12 - month period.  
(9 VAC 5-80-1180, 5-80-110 B, and Condition 3 of the NSR permit issued May 22, 2012)

26. **Process Equipment Requirements - (emission unit ID# 5) – Limitations** – Emissions from the polyurethane sealant application process shall not exceed the limitations specified below:

Volatile Organic Compounds      2.30 lbs/hr      0.60 tons/yr

Annual emissions are to be calculated as the sum of each consecutive twelve 12-month period. (9

VAC 5-50-260, 9 VAC 5-80-110 B, and Condition 11 of the NSR permit issued May 22, 2012)

27. **Process Equipment Requirements - (emission unit ID# 5) – Monitoring and Recordkeeping** –The permittee shall maintain a monthly and annual material balance for the polyurethane sealant application process, including the throughput and emissions of VOC. Hourly throughput (or emissions) shall be calculated by dividing the total monthly throughput (or emissions) by the corresponding hours of unit operation. Annual throughput and emissions shall be calculated as the sum of each consecutive 12-month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

The periodic monitoring requirements for the glass grinding & beveling operations shall be accomplished through the recordkeeping requirements listed above.

(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)

28. **Process Equipment Requirements - (emission unit ID# 5) – Testing** – If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

### **Facility Wide Conditions**

29. **Facility Wide Conditions – Limitations** - The annual production of mirrors shall not exceed 52 million square feet, calculated as the sum of each consecutive 12-month period.  
(9 VAC 5-80-1180, 5-80-110 B, and Condition 10 of the NSR permit issued May 22, 2012)
30. **Facility Wide Conditions – Limitations – Opacity** - No owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any hour of not more than 30% opacity. Failure to meet these requirements due to the presence of water vapor shall not be seen as a violation.  
(9 VAC 5-50-80 and 9 VAC 5-80-110)
31. **Facility Wide Conditions – Limitations – Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard, and shall not return to normal operation until such time as the ambient air quality standard will not be violated.  
(9 VAC 5-20-180 I, 9 VAC 5-80-110 B, and Condition 20 of the NSR permit issued May 22, 2012)
32. **Facility Wide Conditions – Monitoring and Recordkeeping – Equipment Maintenance and Operating Procedures** - In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Maintain an inventory of spare parts that are needed to minimize the duration of air pollution control equipment breakdowns.
  - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
  - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of



five (5) years and shall be made available to DEQ personnel upon request.  
(9 VAC 5-50-20 E, 9 VAC 5-80-110, and Condition 21 of the NSR permit issued May 22, 2012)

33. **Facility Wide Conditions – Monitoring and Recordkeeping** - The permittee shall maintain records of the yearly throughput of mirrors, calculated as the sum of each consecutive 12 - month period. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.  
(9 VAC 5-50-50, 9 VAC 5-80-110 B, and Condition 17 of the NSR permit issued May 22, 2012)
34. **Facility Wide Conditions – Testing** – The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Upon the request of the board, the owner shall provide, or cause to be provided, emissions testing facilities to include: adequate sampling ports; safe sampling platforms with safe access; and utilities for sampling and testing equipment.  
(9 VAC 5-50-30 and 9 VAC 5-80-110)
35. **Facility Wide Conditions – Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)
36. **Facility Wide Conditions – Reporting** – The permittee shall furnish notification to the Director, Southwest Regional Office, of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission or telephone. Such notifications shall be made as soon as practicable, but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Southwest Regional Office, in writing.  
(9 VAC 5-80-110, 9 VAC 5-20-180 C, and Condition 18 of NSR permit issued May 22, 2012)

### **Insignificant Emission Units**

37. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
34	Muriatic Acid (regeneration of deionizers)	9 VAC 5-80-720 B	Hydrochloric Acid	-
52	Defoamer (Coolant Pit and Wastewater Treatment)	9 VAC 5-80-720 B	VOC	-
56	Hydraulic Oil	9 VAC 5-80-720 B	VOC	-
57	Parts Washer	9 VAC 5-80-720 B	VOC	-
61	UV Ink (Printing on Mirror Back)	9 VAC 5-80-720 B	VOC	-
62	Rubber Adhesive (Attach particle board mirror backing)	9 VAC 5-80-720 B	VOC	-
64	Air conditioning unit for vinyl storage	9 VAC 5-80-720B	Chloro-difluoro-methane	-
65	Motor oil tank	9 VAC 5-80-720B	VOC	-
66	Used oil tank	9 VAC 5-80-720B	VOC	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.  
(9 VAC 5-80-110)

### Permit Shield & Inapplicable Requirements

38. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 64	Compliance Assurance Monitoring	-
40 CFR 63	MACT Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Emission Unit 3A exempt per 40CFR63.7575, Definition of Hot Water Heater

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9VAC5-80-110 and 9VAC5-80-140)

## **General Conditions**

39. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable. (9 VAC 5-80-110)
40. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration. (9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
41. **General Conditions - Permit Expiration** - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration. (9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
42. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150. (9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
43. **General Conditions - Permit Expiration** - No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80. (9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
44. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the

previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)

45. **General Conditions - Permit Expiration** - The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)

46. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.  
(9 VAC 5-80-110)

47. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.  
(9 VAC 5-80-110)

48. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedances of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110)

**49. General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification

and over the reporting period;

- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3\_APD\_Permits@epa.gov  
(9 VAC 5-80-110)

- 50. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Southwest Regional Office, within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 48 of this permit.  
(9 VAC 5-80-110 F. 2)
- 51. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Director, Southwest Regional Office, of such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Southwest Regional Office.  
(9 VAC 5-80-110 and 9 VAC 5-20-180)
- 52. **General Conditions - Failure/Malfunction Reporting** - The emission units that have continuous monitors subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not subject to the 14 day written notification.  
(9 VAC 5-20-180)
- 53. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair

the remaining conditions, requirements, or portions of the permit.  
(9 VAC 5-80-110)

54. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9 VAC 5-80-110)
55. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9 VAC 5-80-110)
56. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9 VAC 5-80-110, 9 VAC 5-80-190 and 9 VAC 5-80-260)
57. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9 VAC 5-80-110)
58. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9 VAC 5-80-110)
59. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.  
(9 VAC 5-80-110)
60. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through

9 VAC 5-80-350 in addition to an annual permit maintenance fee consistent with the requirements of 9 VAC 5-80-2310 through 9 VAC 5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9 VAC 5-80-2340, adjusted annually by the change in the Consumer Price Index.

(9 VAC 5-80-110, 9 VAC 5-80-340 and 9 VAC 5-80-2340)

61. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
  - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
  - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
- (9 VAC 5-50-90 and 9 VAC 5-80-110)
62. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to,



monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-80-110)

63. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.  
(9 VAC 5-80-110)
64. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.  
(9 VAC 5-170-130, 9 VAC 5-80-110 K.2, and Condition 19 of the NSR permit issued May 22, 2012)
65. **General Conditions - Reopening for Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:
- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.  
(9 VAC 5-80-110)
66. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.  
(9 VAC 5-80-110 and 9 VAC 5-80-150)
67. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-110 and 9 VAC 5-80-160)
68. **General Conditions - Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-110, 9 VAC 5-80-160, and Condition 23 of the NSR permit issued May 22, 2012)
69. **General Conditions - Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-110, 9 VAC 5-80-160, and Condition 23 of the NSR permit issued May 22, 2012)

70. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-110, 9 VAC 5-80-190 C and 9 VAC 5-80-260)
71. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9 VAC 5-80-110 and 9 VAC 5-80-80 E)
72. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(9 VAC 5-80-110 and 40 CFR Part 82)
73. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9 VAC 5-60-70 and 9 VAC 5-80-110)
74. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(9 VAC 5-80-110 and 40 CFR Part 68)
75. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9VAC5-80-110)

76. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
  - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
  - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.  
(9 VAC 5-80-110)